

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

U.S. ANESTHESIA PARTNERS, INC., et al.

Defendants.

Case No.: 4:23-CV-03560-KH

**DEFENDANT U.S. ANESTHESIA PARTNERS, INC.’S UNOPPOSED MOTION  
TO EXTEND THE DEADLINE FOR FILING ITS ANSWER**

Pursuant to Local Rule 7.2 and Federal Rule of Civil Procedure 6(b), Defendant U.S. Anesthesia Partners, Inc. (“USAP”) respectfully moves the Court for a 21-day extension of time to answer the FTC’s Complaint. This is USAP’s first request for an extension of time to answer the Complaint.

On May 13, 2024, this Court denied USAP’s Motion To Dismiss. *See* Dkt. No. 146. Under Rules 6(a)(1)(C) and 12(a)(4)(A) of the Federal Rules of Civil Procedure, USAP’s Answer is due on May 28, 2024. USAP needs the additional time to investigate the allegations and respond appropriately. USAP therefore submits that good cause exists to extend the deadline for filing USAP’s Answer up to and including Monday, June 17, 2024. On May 22, 2024, counsel for USAP conferred with counsel for the Federal Trade Commission (“FTC”) regarding the relief sought in this motion, and counsel indicated that the FTC does not oppose this motion.

Accordingly, USAP respectfully requests that the Court grant this unopposed motion. A Proposed Order consistent with the relief sought herein is attached.

Dated: May 23, 2024

Respectfully submitted,

David J. Beck (TX Bar No. 00000070)  
(Federal I.D. No. 16605)  
Garrett S. Brawley (TX Bar No. 24095812)  
(Federal I.D. No. 3311277)  
BECK REDDEN LLP  
1221 McKinney Street, Suite 4500  
Houston, TX 77010  
Tel: (713) 951-3700  
Fax: (713) 951-3720  
dbeck@beckredden.com  
gbrawley@beckredden.com

/s/ Mark C. Hansen  
Mark C. Hansen (D.C. Bar No. 425930)  
(*Pro Hac Vice*)  
Attorney-in-Charge  
Geoffrey M. Klineberg (D.C. Bar No. 444503)  
(*Pro Hac Vice*)  
Kyle M. Wood (D.C. Bar No. 90012250)  
(*Pro Hac Vice*)

KELLOGG, HANSEN, TODD,  
FIGEL & FREDERICK, P.L.L.C.  
1615 M Street N.W., Suite 400  
Washington, D.C. 20036  
Tel: (202) 326-7900  
Fax: (202) 326-7999  
mhansen@kellogghansen.com  
gklineberg@kellogghansen.com  
kwood@kellogghansen.com

*Counsel for Defendant U.S. Anesthesia Partners, Inc.*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on May 22, 2024, counsel for USAP conferred via telephone with counsel for the FTC concerning the relief requested in this motion. I am authorized to state that the FTC does not oppose this motion.

Dated: May 23, 2024

Respectfully submitted,

/s/ Geoffrey M. Klineberg

Geoffrey M. Klineberg

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2024, I filed the foregoing document with the Court and served it on opposing counsel through the Court's CM/ECF system. All counsel of record are registered ECF users.

Respectfully submitted,

/s/ Mark C. Hansen

Mark C. Hansen